

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

---

**IN RE:**

**CUMMINGS MANOOKIAN, PLLC**

**Debtor.**

**JEANNE ANN BURTON, TRUSTEE**

**Plaintiff,**

**v.**

**HAGH LAW, PLLC; AFSOON  
HAGH; and MANOOKIAN PLLC,**

**Defendants.**

---

**Case No, 3:19-bk-07235**

**Chapter 7**

**Judge Walker**

**Adv. Proc. No. 3:20-ap-90002**

---

**DEFENDANTS' NOTICE OF OPPOSITION TO PLAINTIFF'S  
REQUEST FOR IMMEDIATE *EX PARTE* RULING ON PLAINTIFF'S  
INCORRECTLY-STYLED "MOTION TO STAY"**

---

The Plaintiff has, this morning, filed an improperly-styled "Motion to Stay Deadlines" which, in fact, does not ask the Court to stay deadlines, but rather to retroactively relieve her of various already-expired deadlines in this matter. Specifically, Plaintiff asks the Court to retroactively change the date for her to respond to Defendants' Motion to Summary Judgment after she failed to oppose that motion by the July 8, 2022 deadline, which was set over nine months ago.

Plaintiff's erroneously-styled "Motion to Stay" contains serial misrepresentations of fact and law, and, presumably for that reason, the Plaintiff simultaneously seeks an

immediate ruling prior to the Defendants being afforded an opportunity to respond. *See*, Plaintiff's Motion at Para. 19.

Defendants give notice that they will file a comprehensive response and memorandum in opposition to Plaintiff's request, and will do so within three (3) business days of Plaintiff's filing, by Wednesday, July 27, 2022.

Defendants respectfully request that the Court decline Plaintiff's invitation to rule on a substantive and prejudicial motion from the Plaintiff seeking a one-way reprieve from long-established and long-expired deadlines before Defendants have an opportunity to respond.

Date: July 22, 2022

Respectfully submitted,

/s/ John Spragens

John Spragens (TN Bar No. 31445)  
Spragens Law PLC  
311 22nd Ave. N.  
Nashville, TN 37203  
T: (615) 983-8900  
F: (615) 682-8533  
john@spragenslaw.com

*Attorney for Manookian PLLC, Hagh  
Law, PLLC, Afsoon Hagh, and Brian  
Manookian*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed July 22, 2022 and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

/s/ John Spragens